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Attorneys for Defendant Andrew Sherman

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SONORO INVEST S.A., a Panamanian
corporation,

Plaintiff,

vs.

ROBERT MILLER, an individual; ANDREW
SHERMAN, an individual; COSTAS
TAKKAS, an individual; and STEPHEN
GOSS, an individual,

Defendants

and

ABAKAN, INC., a Nevada corporation,

Nominal Defendant.

Case No. : 2:15-cv-02286-JAD-CWH

**DECLARATION OF CHRISTINA C.
TIZZANO IN SUPPORT OF JOINT
EMERGENCY MOTION FOR
CLARIFICATION OF ORDER
GRANTING STAY OF DISCOVERY
(ECF NO. 94)**

I, Christina C. Tizzano, hereby declare under penalty of perjury as follows:

1. I am an attorney of Chilcote Law Firm LLP and counsel of record for defendant

1 Andrew Sherman ("Mr. Sherman) in the above-entitled action. I have personal knowledge
2 regarding the information contained herein.

3 2. I submit this Declaration pursuant to L.R. 7-4 and in support of Mr. Sherman and
4 Plaintiff Sonoro Invest S.A.'s Joint Emergency Motion for Clarification of Order Granting Stay
5 of Discovery.

6 3. Mr. Sherman and Plaintiff Sonoro Invest S.A. make the instant motion on an
7 emergency basis because certain of Mr. Sherman's responses to Plaintiff's First Request for
8 Production of Documents are due to be produced on May 31, 2016.

9 4. I hereby certify that Mr. Sherman and Plaintiff Sonoro Invest S.A.'s Joint
10 Emergency Motion for Clarification of Order Granting Stay of Discovery is made in compliance
11 with L.R. 7-4.

12 I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true
13 and correct.

14 Executed this 27th day of May, 2016.

15 By: /s/Christina C. Tizzano
16 CHRISTINA C. TIZZANO
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of May, 2016, a true and correct copy of the foregoing **DECLARATION OF CHRISTINA C. TIZZANO IN SUPPORT OF JOINT EMERGENCY MOTION FOR CLARIFICATION OF ORDER GRANTING STAY OF DISCOVERY (ECF NO. 94)** was served on counsel through the Court's electronic service system as follows:

Electronic Service:

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(*pro hac vice to be submitted*)

Richard Mescon, Esq.
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